

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JORDAN SCHNUR, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

PAPA JOHN'S INTERNATIONAL, INC.,
d/b/a PAPA JOHN'S

Defendant.

Civil Case No. 2:22-cv-01620-NR

**DECLARATION OF JOSHUA HALL IN SUPPORT OF DEFENDANT'S
MOTION TO DISMISS THE AMENDED COMPLAINT**

I, Joshua Hall, declare as follows:

1. I am a Sr. Manager, Digital Engineering, in Web Applications – Information and Digital Solutions at Papa John's International, Inc. ("Papa John's"). I submit this declaration in support of Papa John's motion to dismiss. I have personal knowledge of the facts set forth herein and, if called upon to testify, could and would testify competently about them.

2. My responsibilities in this role include overseeing, managing, and working on the design, development, architecture, monitoring, and maintenance of Papa John's digital platforms, as well as ongoing documentation and support related to those platforms. In connection with these responsibilities, I have access to and am familiar with Papa John's practices for documenting historical versions of its public website.

3. Attached hereto as **Exhibit 1** is a true and correct copy of a PDF printout showing the steps that a visitor to www.papajohns.com would have taken to place an order for pizza from Papa John's through its website from November 15, 2020, through November 15, 2022.

4. As is reflected in **Exhibit 1**, a visitor placing an order online during this time period would have had to search for and select their location and order type (delivery or carryout), enter their information, customize their order, add the desired items to their cart, and then proceed to the checkout screen to enter their payment information and complete their order.

5. To review their order and proceed through checkout, the visitor would have had to check a box next to text stating “I understand & agree my information will be used as described in the Privacy Policy.” The words “Privacy Policy” were green, underlined, and contained a hyperlink to the then-effective version of Papa John’s Privacy Policy.

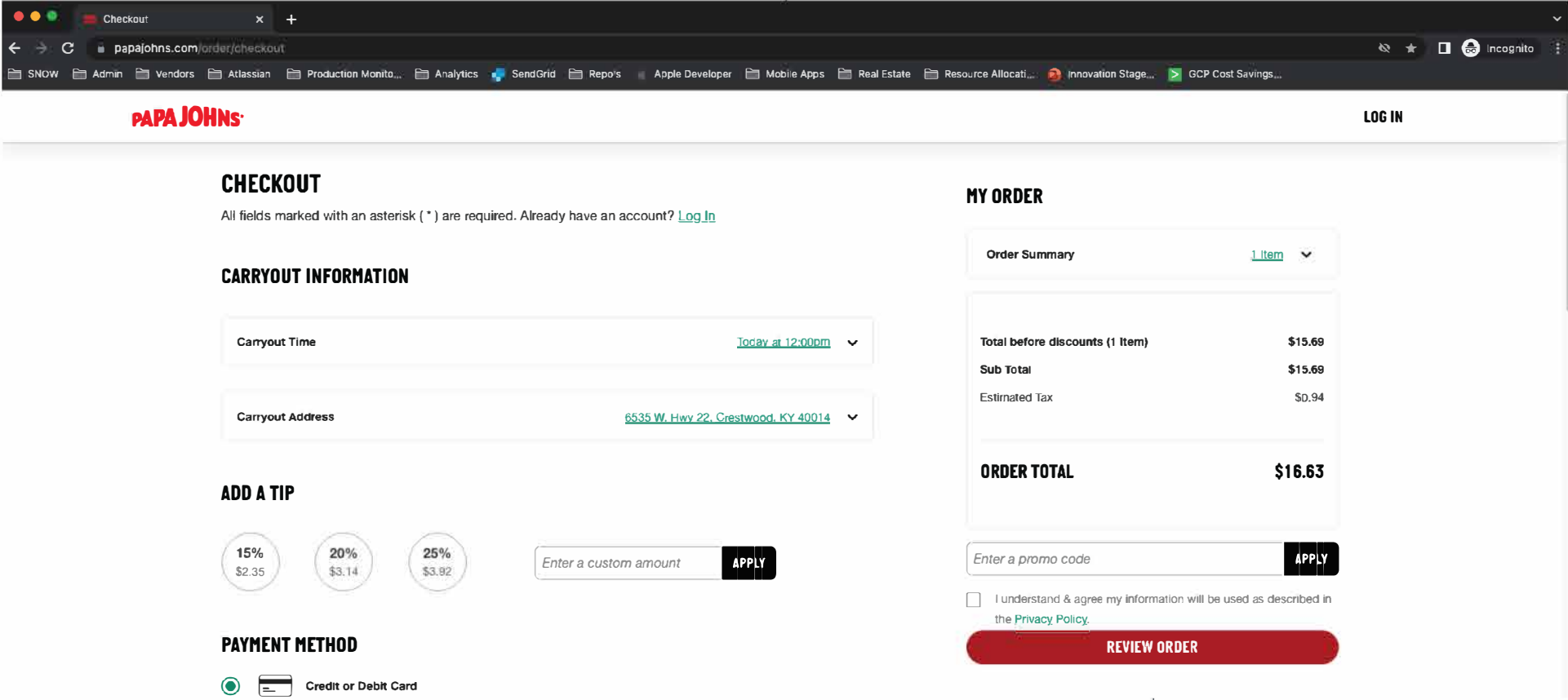
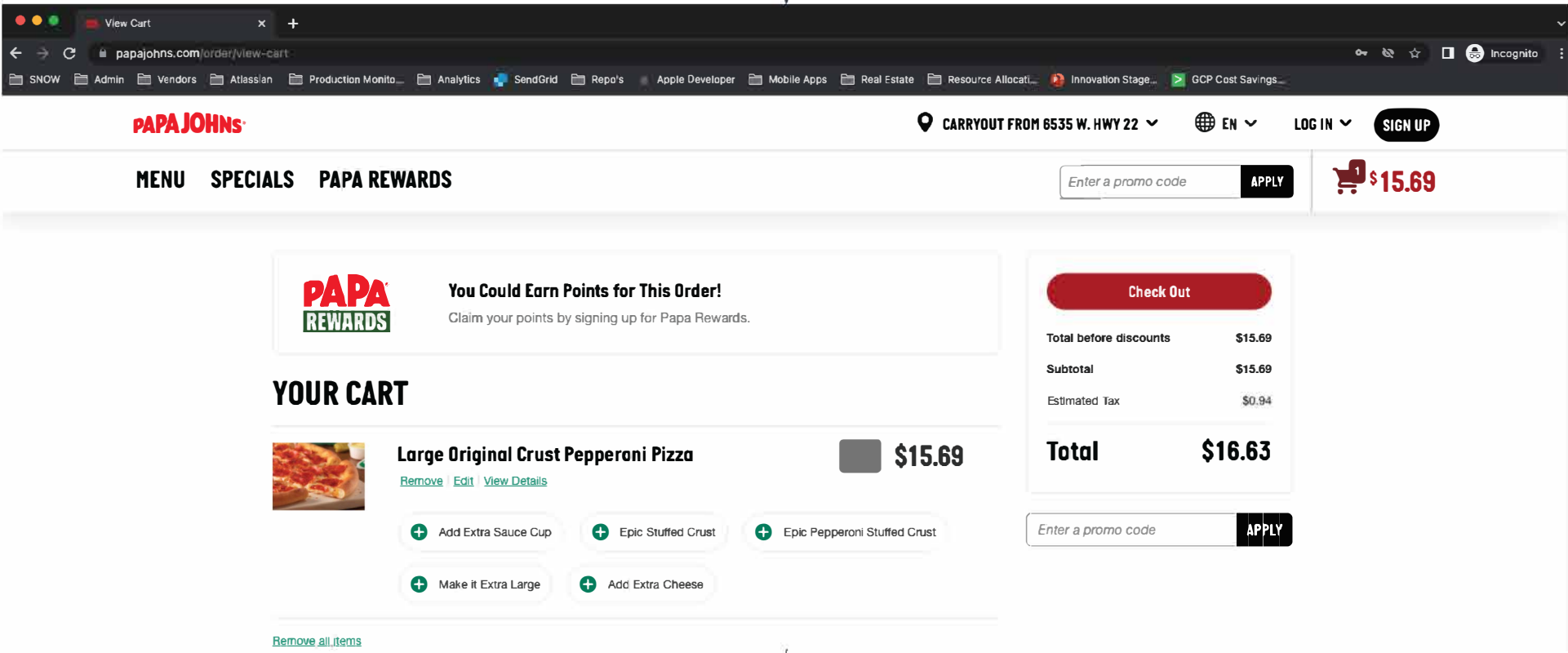
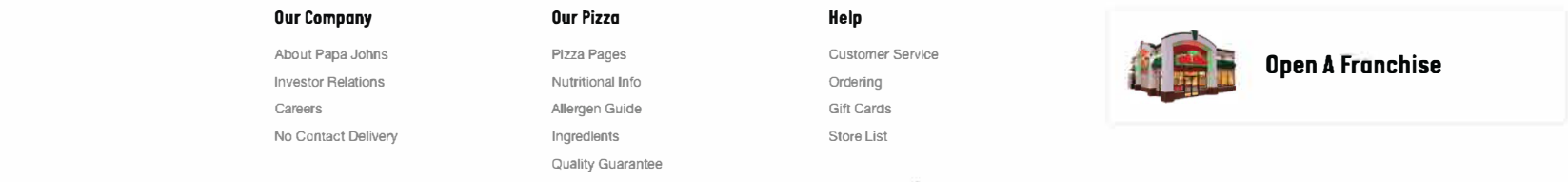
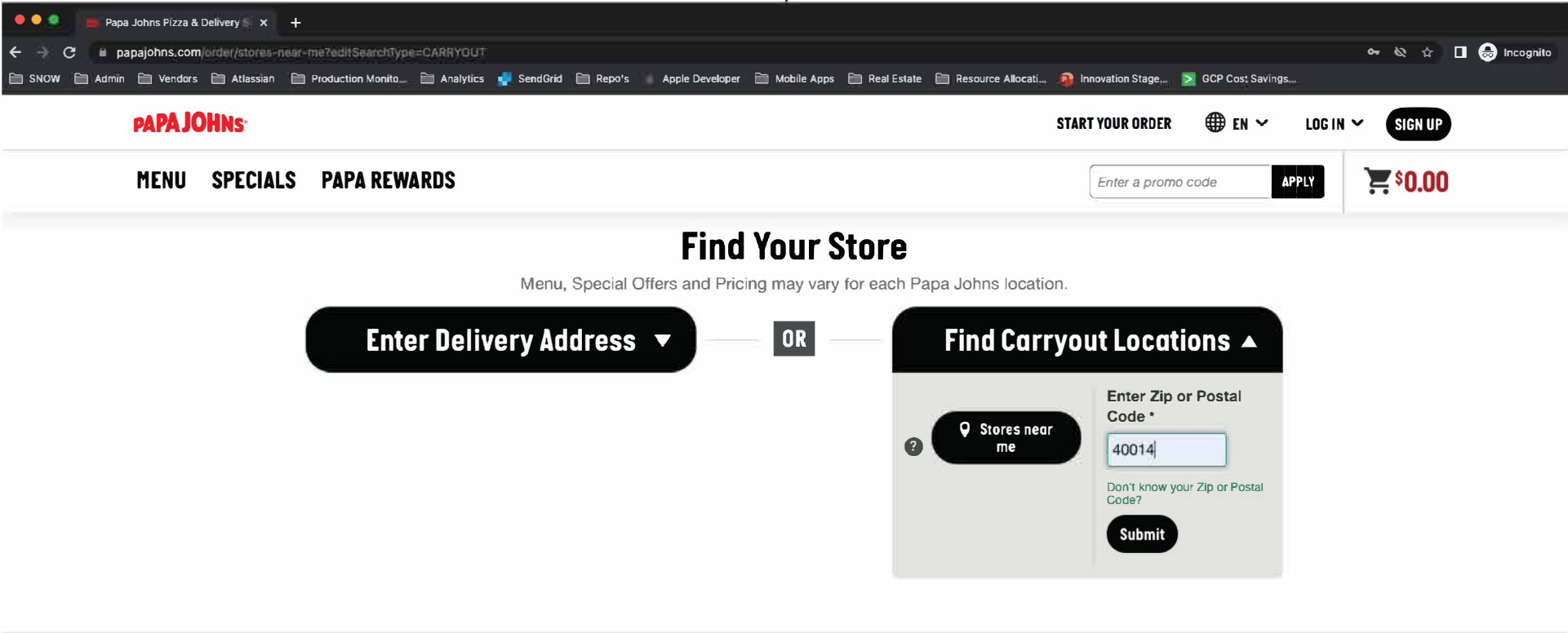
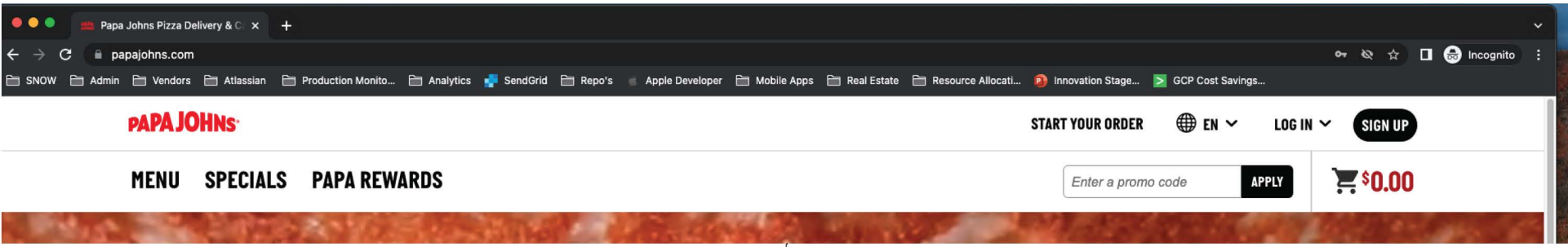
6. That Privacy Policy was also linked on every page of Papa John’s website from November 15, 2020, through November 15, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 13, 2023.


Joshua Hall

EXHIBIT 1



☐ I understand & agree my information will be used as described in the [Privacy Policy](#).

REVIEW ORDER